

## REMARKS

Applicants appreciate the Examiner's thorough examination of the present application as evidenced by the Office Action of November 3, 2005 (hereinafter "Office Action"). Applicants especially appreciate the indication that Claims 7 - 9 recite patentable subject matter. In response, Applicants respectfully submit that the cited reference does not disclose or suggest, all of the recitations of the independent claims. Accordingly, Applicants submit that all pending claims are in condition for allowance. Favorable reconsideration of all pending claims is respectfully requested for at least the reasons discussed hereafter.

### **Claims 1, 37, and 40 are Patentable**

Independent Claims 1, 37, and 40 stand rejected under 35 U.S.C. §102(b) as being anticipated by U. S. Patent Application 5,511,190 to Sharma et al. (hereinafter "Sharma"). (Office Action, page 2). Independent Claim 1 is directed to a method of responding to a customer communication that recites, in part:

...  
generating a hash key value based on a plurality of selector values;  
selecting an entry in the database having an address corresponding to the hash key value, **wherein entries in the database include corresponding hash values;**  
evaluating the selected entry to determine if the entry in the database corresponds to the plurality of selector values;  
incrementing the address corresponding to the hash key value if the selected entry does not correspond to the plurality of selector values;  
wherein the selecting, the evaluating and the incrementing are repeated until the hash value included in selected entry has a value which indicates that entries subsequent to the selected entry will not correspond to the plurality of selector values. (Emphasis added).

Independent Claims 37 and 40 include similar recitations. Thus, according to the independent claims, a hash key value is generated based on a plurality of selector values. An entry is selected in a database that has an address corresponding to the hash key value. Moreover, the entries in the database include corresponding hash values.

The Office Action cites a passage at column 2, lines 63 - 67 of Sharma as disclosing this aspect of the present invention. (Office Action, pages 2 and 3). This passage from the Summary of the Invention section refers to reading the entries in table T1 212 in memory 116.

In sharp contrast to the recitation of independent Claims 1, 37, and 40, however, entries are not selected from the table T1 212 corresponding to a hash key value. Instead, a hash function HF 210 is applied to the unique values in the group columns GC 252 of the table T1 212 to generate an index for hash table 216. (Sharma, col. 8, lines 5 - 10). The hash table 216 contains addresses that correspond to entries in the group table 218. Thus, Applicants submit that the hash table 216, which has entries corresponding to hash key values generated by the hash function HF 210, is not evaluated to determine if entries therein correspond to the plurality of selector values used by the hash function HF 210 to generate the hash key value. This is because hash table 216 simply contains addresses for the group table 218.

If it is alleged that the group table 218 is a database from which entries may be selected corresponding to a hash key value, then Applicants respectfully submit that unlike the recitations of independent Claims 1, 37, and 40, the entries in the group table 218 do not include corresponding hash values. It appears that the group table 218 merely contains summarized/aggregated data based on the table T1 212, *see, e.g.*, Sharma, col. 6, line 56 - col. 7, line 16).


For at least the foregoing reasons, Applicants respectfully submit that independent Claims 1, 37, and 40 are patentable over Sharma and that dependent Claims 2 - 13, 37, and 40 are patentable at least by virtue of their depending from an allowable claim.

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### CONCLUSION

In light of the above amendments and remarks, Applicants respectfully submit that the above-entitled application is now in condition for allowance. Favorable reconsideration of this application, as amended, is respectfully requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (919) 854-1400.

Respectfully submitted,

  
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